

IN THE UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF TEXAS

FORT WORTH DIVISION

KELLY BLAND,

Plaintiff,

v.

Civil Action No. 4:24-cv-01022-O-BP

1ST TEXAS HEALTH & LIFE LLC, AARON HANSOME, et al.,

Defendants.

**DEFENDANT'S MOTION FOR LEAVE TO CONTACT PRIOR DEFENDANTS,
COUNSEL, OR WITNESSES IN PLAINTIFF'S RELATED TCPA LITIGATION**

IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS

FORT WORTH DIVISION

**BEFORE THE HONORABLE REED O'CONNOR, U.S. DISTRICT JUDGE
AND THE HONORABLE HAL R. RAY, JR., U.S. MAGISTRATE JUDGE**

Defendant Aaron Hansome, appearing Pro Se, respectfully moves this Court for leave to conduct limited informal investigation by contacting prior defendants, counsel, or witnesses involved in other Telephone Consumer Protection Act ("TCPA") cases initiated by Plaintiff Kelly Bland. In support thereof, Defendant states as follows:

1. This motion is brought under Federal Rule of Civil Procedure 26(b)(1), which allows discovery of any nonprivileged matter relevant to a party's claim or defense and proportional to the needs of the case. This request seeks permission to contact nonparties for the limited purpose of confirming whether Plaintiff's TCPA litigation history demonstrates patterned coordination, shared verbiage, repeated witnesses, or cottage-industry-like behavior relevant to defenses such as abuse of process, unclean hands, or civil extortion.

2. Based on evidence obtained to date, including communications, language patterns, settlement tactics, and publicly filed pleadings, Defendant believes Plaintiff has coordinated or recycled litigation strategies with other serial TCPA litigants, including, but not limited to, her sister Kimberly Starling and Wes Newman. Notably, Plaintiff appeared alongside Newman in an evidentiary submission in *Schwartz v. The Hall Insurance Group Inc.*, Case No. 1:23-cv-00374 (S.D. Ohio), in which the Honorable Judge Karen L. Litkovitz ultimately declined to admit their proffered evidence, raising concerns regarding the reliability or admissibility of such coordinated submissions.

3. Several individuals have surfaced in this matter either as referenced witnesses or through Plaintiff's disclosures and communications. Notably, Wes Newman was disclosed by Plaintiff as having communicated with her concerning Defendant, despite also appearing in litigation coordinated with other serial plaintiffs.

4. Defendant seeks leave to initiate contact with prior named defendants, their counsel, or known witnesses from Plaintiff's other cases to:

- (a) confirming repeated patterns in alleged calls, claim language, or vendor names;
- (b) collecting informal declarations regarding Plaintiff's settlement or discovery posture;
- (c) comparing timelines across overlapping TCPA complaints.

5. Defendant commits to limiting such outreach to publicly identified parties, with a focus on clarifying shared litigation patterns or possible abuse of process. This motion does not request leave to subpoena or compel, but simply to contact for informal discussion or declaration.

6. A conference email was sent to Plaintiff on June 25, 2025, referencing this motion and inviting discussion pursuant to Local Rule 7.1(b). Plaintiff did not provide consent. The relevant correspondence is reproduced on page 4 of this filing as part of the motion body for transparency and record-keeping.

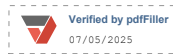
7. In light of Plaintiff's refusal to provide specific nonprivileged information regarding other TCPA claims, and given the similarity of litigation posture, this motion is made in good faith to support necessary discovery efforts and to reduce reliance on speculative or unverified facts.

WHEREFORE, Defendant respectfully requests that the Court grant leave to contact former defendants, attorneys, or witnesses associated with Plaintiff's prior TCPA cases for the purpose of informal inquiry or declaration gathering relevant to Defendant's defenses.

Respectfully submitted,

Aaron Hansome, Pro Se





641 E San Ysidro Blvd. B3328

San Ysidro, CA 92173

(619) 289-7442

aaronmhansome@gmail.com

CERTIFICATE OF SERVICE

I hereby certify that on this 6th day of July, 2025, a true and correct copy of the foregoing document was served via email, pursuant to the Federal Rules of Civil Procedure and the Local Rules of the Northern District of Texas, upon the following party:

Kelly Bland

Email: KellyBland516@gmail.com

Respectfully submitted,

/s/ Aaron Hansome

Aaron Hansome, Pro Se

641 E San Ysidro Blvd. B3328

San Ysidro, CA 92173

(619) 289-7442

aaronmhansome@gmail.com

Meet and Confer – Intent to Contact Former Defendants and Vendors Regarding Litigation Pattern

Aaron Hansome

<aaronmhansome@gmail.com>

Jun 25, 2025, 1:57 PM (10 days ago)

☆ 😊 ↶ ⋮

to Kelly

Good afternoon Mrs. Bland,

Pursuant to Local Civil Rule 7.1 and in the interest of maintaining a transparent and respectful discovery process, I am writing to inform you of my intent to contact former defendants, vendors, or witnesses involved in your prior TCPA lawsuits for the purpose of gathering declarations or factual accounts related to litigation patterns, settlement language, and vendor interactions similar to the ones currently at issue in this case.

To be clear:

I will not contact any individual or entity currently represented in this action.

I will not seek or use privileged or confidential communications.

The scope of my inquiry is strictly limited to prior publicly filed cases and to individuals not presently under representation to your knowledge.

If you believe any prior defendant or witness is represented or otherwise off-limits under Rule 4.2 of the ABA Model Rules or other applicable standards, please advise in writing no later than Friday, June 28, 2025.

If I do not receive objections identifying specific individuals or entities who are represented or otherwise inappropriate for contact, I will proceed in good faith with limited outreach and reserve the right to file a corresponding Notice of Intent to Investigate with the Court.

Respectfully,

Aaron Hansome


Pro Se Defendant

aaronmhansome@gmail.com

(619) 289-7442

641 E. San Ysidro Blvd. B3328


San Ysidro, CA 92173



Kind regards,

Aaron Hansome

Kelly Bland



Jun 26, 2025, 5:36 AM (9 days ago)

☆ 😊 ↶ ⋮

to me

Mr Hansome, without knowing more about what information you are trying to get, it's difficult to respond. Be advised there are confidentiality clauses in some of my settlements where disclosure of "settlement language" would violate those contracts. Depending on what information you are seeking, your requests may constitute tortious interference with my contractual rights. Govern yourself accordingly.

Respectfully,

kelly bland

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Re: Meet and Confer – Informal Outreach to Prior Defendants

Aaron Hansome

<aaronmhansome@gmail.com>

Thu, Jun 26, 10:44 AM (9 days ago)

☆ 😊 ↶ ⋮

to Kelly

Good afternoon Mrs Bland,

And thank you for your response.

To clarify, I do not intend to request or discuss any confidential settlement terms. I am simply seeking to hold informal conversations with parties from your prior TCPA cases, when permissible, to understand their general experience and any non-confidential facts about the circumstances.

There is no intent to interfere with any contract or violate any privilege. If any contacted party indicates they are represented or restricted from commenting, the outreach will immediately cease.

This inquiry is limited to understanding recurring litigation behavior relevant to my defense.

Respectfully,

Aaron Hansome

Pro Se Defendant

aaronmhansome@gmail.com

(619) 289-7442

641 E San Ysidro Boulevard B3328

San Ysidro CA. 92173



Kind regards,

Aaron Hansome